IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

ZEROCLICK, LLC,	
Plaintiff.	
v.	Civil Action No. 6:19-cv-00569-ADA
DELL TECHNOLOGIES, INC.,	
Defendant.	

JOINT STIPULATION TO TRANSFER VENUE TO AUSTIN DIVISION

WHEREAS, the above-captioned action was filed by Plaintiff Zeroclick, LLC ("Zeroclick") against Defendant Dell Technologies, Inc. ("Dell") in the United States District Court for the District of Texas, Waco Division on June 28, 2019;

WHEREAS, in the above-captioned action, Plaintiff alleges that certain of Dell's products infringe U.S. Patent 7,818,691 (the "Asserted Patent");

NOW, THEREFORE, Zeroclick and Dell, through each's respective counsel, hereby jointly stipulate to the entry of an Order transferring the above-captioned action to the United States District Court for the Western District of Texas, Austin Division, for the convenience of the parties and witnesses and in the interest of justice, pursuant to 28 U.S.C. § 1404(b). Zeroclick and Dell request that an Order be entered directing the Clerk of Court to transfer the above-captioned case to the Austin Division but to remain on the docket of this Court.

Respectfully submitted,

Dated: March 11, 2020

/s/ Barry K. Shelton

Barry K. Shelton Texas State Bar No. 24055029 SHELTON COBURN LLP 311 RR 620, Suite 205 Austin, TX 78734-4775 bshelton@sheltoncoburn.com (512) 263-2165 (Telephone) (512) 263-2166 (Facsimile)

Richard A. Cederoth (pro hac vice pending) SIDLEY AUSTIN LLP One South Dearborn Street Chicago, IL 60603 rcederoth@sidley.com (312) 853-7000 (Telephone) (312) 853-7036 (Facsimile)

Michael J. Bettinger (pro hac vice pending) Irene Yang (pro hac vice pending) SIDLEY AUSTIN LLP 555 California Street, Suite 2000 San Francisco, CA 94104 mbettinger@sidley.com irene.yang@sidley.com (415) 772-1200 (Telephone) (415) 772-7400 (Facsimile)

Attorneys for Defendant Dell Technologies, Inc.

/s/ Brian D. Ledahl

Marc A. Fenster, CA SBN 181067 mfenster@raklaw.com Brian D. Ledahl, CA SBN 186579 bledahl@raklaw.com RUSS AUGUST & KABAT 12424 Wilshire Blvd. 12th Floor Los Angeles, CA 90025 Phone: (310) 826-7474

Attorneys for Plaintiff Zeroclick LLC.

CERTIFICATE OF SERVICE

The undersigned certifies that on this 11th day of March 2020, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3). Any other counsel of record will be served by a facsimile transmission and/or first-class mail.

/s/ Barry K. Shelton
Barry K. Shelton